

# **EXHIBIT D**

## Heinz, Emily

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**From:** Baskir, Matthew  
**Sent:** Wednesday, October 24, 2012 2:45 PM  
**To:** kborland@borlandandborland.com  
**Cc:** Goldman, Jerry S.; Heinz, Emily  
**Subject:** FW: Defendants's First Set of Interrogatories and Document Request  
**Attachments:** 20120502170603890.pdf; 20120502170619159.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Kim-

Attached are the discovery requests that we served on your client at the beginning of May. Given that we stayed full discovery for jurisdictional discovery, we never received responses to these requests. We anticipate that you will provide us with responses by the end of the month. Please contact us if you would like to discuss.

Regards,

Matt



**Matthew Baskir**  
Attorney

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**From:** Balsdon, Nicholas  
**Sent:** Wednesday, May 02, 2012 5:44 PM  
**To:** 'kborland@borlandandborland.com'; Goldman, Jerry S.  
**Cc:** McMullen, Darin; Baskir, Matthew  
**Subject:** Defendants's First Set of Interrogatories and Document Request

Attached please find a copy of Defendant's First Set of Interrogatories and Document Request